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EX-PARTE

July 24, 2012

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**Re: *Notice of Ex-Parte*
 Allband Communications Cooperative
 *FCC Dockets:***

In the matter of: Connect America Fund, WC Docket No. 10-90
A National Broadband Plan for Our Future, GN Docket No. 09-51
Establishing Just and Reasonable Rates for Local Exchange Carriers,
WC Docket No. 07-135
High-Cost Universal Service Support, WC Docket No. 05-337
Developing an Unified Intercarrier Compensation Regime,
CC Docket No. 01-92
Federal-State Joint Board on Universal Service, CC Docket No. 96-45
Lifeline and Link-Up, WC Docket No. 03-109
Universal Service Reform--Mobility Fund, WT Docket No. 10-208

Dear Ms. Dortch:

On Thursday, July 19, 2012, a conference call, initiated at the suggestion of James Carr of the Office of General Counsel, was conducted to discuss the status of the February 3, 2012 Waiver Petition of Allband Communications Cooperative, currently pending before the Commission, and also a stay motion that Allband is considering filing in the consolidated appeals of the Commission's order in these dockets pending in the United States Court of Appeals, 10th Circuit, Docket 11-9900 *et al.* The discussion concerning the stay motion was conducted as a follow-up to undersigned counsel's attached July 16, 2012 memorandum on behalf of Allband to James Carr sent in accordance with the Court's Rule 27.3(C). The conference call also included discussion of Allband's need for an expeditious decision on its waiver petition, and a request by the Staff of the Wireline Competition Bureau for additional information concerning Allband's penetration rates, which request was followed by an email to undersigned counsel which was forwarded to Allband. The response to the FCC Staff's information request is documented in a separate Ex-Parte Notice filed this date in these dockets.

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The following persons participated in the July 19, 2012 conference call:

James Carr	Office of General Counsel
Don L. Keskey	Counsel for Allband Communications Cooperative
Trent Harkrader	Wireline Competition Bureau
Amy Bender	Wireline Competition Bureau
Susan Stevens-Miller	Wireline Competition Bureau

In accordance with the Commission's rules, this letter and the attachment are being filed electronically in the dockets identified above.

Respectfully submitted,

ALLBAND COMMUNICATIONS COOPERATIVE

By its counsel

Don L. Keskey

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DLK/cjd
Atts.

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M E M O R A N D U M

July 16, 2012

TO: James Carr
Liaison Counsel for Respondents

James Ramsey
Liaison Counsel for Petitioners and Intervenors

FROM: Don L. Keskey 
Counsel for Allband Communications Cooperative
Public Law Resource Center PLLC

RE: **10th Circuit U.S. Court of Appeals Docket No. 11-9900
(consolidated appeal from FCC 11-161).**

This memo is sent to each of you in compliance with the March 13, 2012 "Order Governing Motion Practice in the Consolidated Proceedings", entered in the 10th Circuit Court of Appeals Docket No. 11-9900, the consolidated case involving review of the Commission's Order in FCC 11-161.

The first request made herein is to obtain your consideration of, and to obtain your position concerning, an upcoming motion that Allband Communications Cooperative (Allband) plans on filing in the consolidated court appeal. Specifically, Allband plans on filing a Motion for Stay of the per-line cap adopted in the FCC's Order as applied to Allband.

This memo is also sent to you to comply with the Court's Rule 27.3(C), the "confer and report rule" referenced in the Court's March 13 order. We are requesting that you confer with us, and consider agreeing to the relief sought in Allband's planned Stay Motion, namely, a stay of the per-line cap as applied to Allband. Perhaps the Commission itself is considering the equivalent of such relief pursuant to Allband's February 3, 2012 Waiver Petition and June 27, 2012 Stay Petition pending in the FCC Dockets, which may provisionally resolve this matter.

This memo requests that you provide your position on Allband's planned Stay Motion so that we may complete the Statement of Liaison Counsels' Positions section of our motion, as required by the March 13, 2012 Order.

Memorandum to James Carr and James Ramsey
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Since time is of the essence, please respond to this request as soon as possible. I note that the Court's March 13, 2012 order (page 3) provides a minimum of one week for this "confer and report" process to be conducted in advance of the filing of Allband's Stay Motion.

Please advise me if you have any questions regarding this matter.

DLK/cjd

cc: Ron Siegel
General Manager
Allband Communications Cooperative